

FILED
Western District of Washington
at Seattle

DEC 27 2022

MARK L. HATCHER, CLERK
OF THE BANKRUPTCY COURT

WESTERN DISTRICT OF WASHINGTON BANKRUPTCY COURT

IN RE

Billie Jean Harris

NO. 22-11028

**SUPPLEMENTAL OBJECTION TO
CLAIM #3 AND NOTICE OF
HEARING**

I. NOTICE

Take notice that a hearing has been scheduled on the objection to Claim #3
as follows:

Judge: Dore

Place: Seattle Bankruptcy Court

Time: 9:30 AM

Date: January 4, 2022

If you oppose this motion you must file a response by December 28, 2022. If
you fail to file a response the court may strike the hearing and consider the motion
without a hearing.

OBJECTION TO CLAIM

II. MOTION

I, Curtis Harris, the husband of the debtor Billie Jean Harris and owner of the property 34906 Military Road S, Auburn, WA 98001, and Billie Harris, the debtor¹ objects to the Claim filed on behalf of Deutsche Bank National Trust Company (Deutsche Bank) in this case.² My objections include the following:

I believe the deed of trust for Deutsche Bank is void. Deutsche Bank has been claiming that it can enforce a deed of trust recorded in favor of Ameriquest Mortgage Corporation. We have been trying to list and sale our residence as detailed in our proposed plan. During this time, a Title Insurance Company, Chicago Title, provided a title report identifying defects in the 2004 Deed of Trust. See Title Report Schedule B, Part II, Paragraph 4. It has said that it is unable to insure a sale of the property because there is not a valid person to pay on the deed of trust.

Alternately, I believe the deed of trust was discharged in the 2008 bankruptcy that I completed. See Case 08-10108. I am asking that the court confirm that the deed of trust is discharged so it does not continue to block the sale of our residence.

¹ While I, Billie Harris am represented in this case, the representation was to cover confirming a plan and this objection to claim exceeds the scope of representation. I ask that the court address me directly on this matter.

² The full name is Deutsche Bank National Trust Company, as Trustee for Ameriquest Mortgage Securities Inc., Asset-Backed Pass-Through Certificates, Series 2004-R5 (hereinafter "Deutsche Bank").

OBJECTION TO CLAIM

December 20-2022


Billie Harris, Debtor



Curtis Harris, Property Owner

Given this history, I am asking that the court apply an equitable theory under Washington law or Bankruptcy Law to reduce or deny the Deutsche Bank Claim #3.


November 4, 2022


Curtis Harris

I, Billie Harris make this declaration based on my personal knowledge.

1. I have attached a true and correct copy of the Chicago Title, Title Report.
2. I have also attached a true and correct copy of the Final Report and Account from the completed Chapter 13 Plan.

I make this declaration under the penalty of perjury under the laws of Washington in Auburn, Washington on the ____ day of December, 2022.


Billie Harris

OBJECTION TO CLAIM